



1 Purpose

This Supplier Code of Conduct (“SCoC”) is made on behalf of Bluesource Information Limited (“Bluesource”).

At Bluesource, we are committed to maintaining ethical and sustainable business practices across the business, within our day-to-day operations and our supply chain, such as:

- Conducting Business in a socially responsible and ethical manner.
- Protecting the environment and the safety of people.
- Supporting Human Rights and labor practices.
- Engaging, learning from, respecting, and supporting the communities and cultures with which we work.
- Anticorruption.
- Fraud and money laundering.
- Health and safety.

This SCoC will be used as a guide to collaborate with our suppliers in the promotion of lawful, professional, and responsible business practices and applies to all companies and individuals that provide goods and/or services to Bluesource (collectively “Suppliers”). It also supports Bluesource’s policy on Corporate and Social Responsibility (available at:

<https://www.Bluesource.co.uk/about/privacy-and-governance/> .

2 Applicability

This Policy applies to all suppliers and subcontractors who provide a service to either Bluesource or one of Bluesource’s customers.

3 Standard’s Alignment

This Supplier Code of Conduct is aligned with:

- ISO/IEC 27001:2022 – Information Security Management
- The United Nations Global Compact (UNGC) – Ten Principles
- Bluesource’s Sustainability Policy (available at: <https://bluesource.co.uk/privacy-and-governance/>).
- Bluesource’s “[Data Protection and Information Security Requirements for Suppliers](#)” policy.

Suppliers are expected to operate in a manner consistent with these frameworks and to support Bluesource in meeting its legal, contractual, security, ethical, and sustainability obligations.

4 Supplier Responsibilities

The provisions of this SCoC sets out the minimum standards of conduct that Bluesource expects from its Suppliers in accordance with the Standard's Alignment (section 3).

Suppliers must advise Bluesource of any non-compliance of their responsibilities and where risks are identified, co-operate on any reasonably necessary actions.

Suppliers must also ensure equivalent standards are flowed down and applied throughout their own supply chains.

4.1 Data security and privacy

To meet Bluesource's information security requirements and meet its obligations under ISO27001, Suppliers shall:

- **Comply with Bluesource's "[Data Protection and Information Security Requirements for Suppliers](#)" policy** in relation to the performance of services to Bluesource and its customers, except as otherwise agreed in writing between the Parties.
- Implement and maintain an **information security management system** proportionate to the services provided and risks posed to Bluesource information assets.
- Implement and maintain a **data classification scheme** to protect the integrity, confidentiality and accessibility of data entrusted to the.
- **Adhere to applicable data privacy law.**
- Perform **regular risk assessments** relating to the confidentiality, integrity, and availability of Bluesource data.
- Apply appropriate **access controls on a need-to-know and minimum rights basis** , logging, and segregation of duties.
- Ensure that **sub-contractors and sub-processors** are subject to equivalent security and privacy obligations.
- Support Bluesource with **security assurance activities and the right to audit**, including audits, formal risk assessments, attestations, or evidence requests where reasonably required.
- Ensure personnel with access to Bluesource and Bluesource Customer data receive **ongoing information security awareness and training, at least annually.**
- **Report any actual and suspected data breaches** involving Bluesource or Bluesource's customers data within 24 hours to Bluesource.
- **Not further process** Bluesource or Bluesource's customers data other than intended or for longer than reasonably necessary.
- **Manage business continuity risk** in terms of ensuring availability of critical services to bluesource during a disaster event and have suitable business continuity and recovery plans in place..

If a Supplier is requested or required to disclose any of Bluesource and/or Bluesource's customer confidential information under a subpoena, court order, statute, law, rule, regulation, regulatory request or other similar requirement (a "Legal Requirement"), the Supplier must, to the extent not precluded by law, provide prior prompt notice of such Legal Requirement to Bluesource prior to the disclosure.

4.2 United Nations Global Compact principles

Bluesource supports the principles of responsible and sustainable business aligned with the **United Nations Global Compact (UNGC)** and expects its suppliers to follow similar principles, covering the UNGC's 10 principles:

- Human Rights (Principles 1–2)
- Labour (Principles 3–6)
- Environment (Principles 7–9)
- Anti-Corruption (Principle 10).

Suppliers must avoid actions that cause, contribute to, or are directly linked to adverse human rights, environmental, or ethical impacts through their operations or business relationships.

These guiding principles are outlined in more detail below:

Business Ethics

Bluesource expects its Suppliers to conduct its business dealings and interactions in the highest ethical manor and expects all Suppliers to:

- Promote** good business ethics and governance;
- Comply** with contractual requirements on confidentiality and information security;
- Protect** Intellectual Property Rights; and
- Promptly **advise** Bluesource of any:
 - Conflicts of interest
 - Politically exposed person/s working in a senior position for the Supplier
 - Supplier is found or suspected of being in breach of any of the responsibilities outlined in this SCoC, such as being investigated for fraud, or breach of human rights, etc.

Human rights (Principles 1-2)

Bluesource does not accept child labour or forced labour and supports the UN Convention on the Rights of the Child (UNCRC) and that of the International Labour Organisation (ILO). Bluesource expects its Suppliers to:

- Suppliers must have appropriate processes to **identify, prevent, mitigate, and remediate** adverse human rights impacts in line with the **UN Guiding Principles on Business and Human Rights**.
- Provide a safe and secure workplace for their employees, with Health and Safety management in place;
- Comply with all applicable laws and regulations when setting employee conditions on working hours, benefits, wages (such as minimum wages, London minimum wages, gender pay gap), and age;
- Not tolerate human rights abuses, including slavery and human trafficking, and will not engage or be complicit in any activity that solicits or encourages human rights abuse;
- Comply with all applicable laws relating to child labor, modern slavery and human trafficking, such as those outlined in Bluesource's own [Anti-Slavery and Human Trafficking Policy and Statement](#);
- It will always strive to build trust, deliver mutual advantage, and demonstrate respect for cultures, customs and values of individuals and groups; and
- Ensure that their supply chain are also compliant.
- Where risks are identified, Suppliers must cooperate with Bluesource on corrective actions.

Labor, Inclusion and diversity (Principles 3-6)

Bluesource is committed to providing equal opportunities, diversity and inclusion and expects its Suppliers to:

- ❑ **Reject any form of discrimination** in hiring and employment practices, such as, and not limited to, race, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership, or political affiliations; and
- ❑ Provide **equal opportunities** and treatment for all employees.

Environment (Principles 7–9)

Bluesource aims to manage its impact on the environment as much as possible and expects its Suppliers to:

- ❑ Actively support environmentally responsible practices aligned with Bluesource's **Sustainability Policy**.
- ❑ Identify, manage, and reduce environmental impacts across their operations and supply chains.
- ❑ Take reasonable steps to **reduce greenhouse gas emissions**, energy consumption, and waste.
- ❑ Support paper-free, digital-first, and energy-efficient ways of working where applicable.
- ❑ Consider **lifecycle environmental impacts** when delivering goods or services to Bluesource.
- ❑ Provide sustainability information or metrics upon reasonable request, particularly where suppliers contribute to Bluesource's **Scope 3 emissions**.

Anticorruption, Fraud and Money Laundering (Principle 10)

Bluesource conducts all its business in an honest and ethical manner. It takes a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever they operate and implement and enforce effective systems to counter bribery. Bluesource expects all Suppliers to:

- ❑ **Comply** with all applicable laws and regulations on corruption, bribery, prohibited business practices, fraud, money laundering and extortion.
- ❑ **Disclose** any potential or actual conflicts of interest to Bluesource.
- ❑ Have a process in place to **report** actual or suspected fraud and/or money laundering, such as the whistle blowing policy detailed below in section 8 below.

5 Gifts and Entertainment

Bluesource appreciates that the practice of giving business gifts and hospitality varies between companies and countries and regions, and what may be normal and acceptable to one may not be in another.

We expect our Suppliers to refrain from providing personal gifts, fees, favors, other compensation, or business courtesies, including entertainment activities, that are intended to influence, or might reasonably appear to influence, a business decision.

6 Health and Safety

Bluesource takes health and safety seriously and aims to create an office environment that is both pleasant and safe to work in for its employees and visitors. We expect our suppliers to prioritize the occupational health and safety of their employees and meet legal, regulatory and contract specific requirements when performing their contractual obligations for Bluesource and/or Bluesource's customers.

7 Monitoring

Bluesource may require suppliers to:

- Provide evidence of compliance (e.g. policies, certifications, assessments).
- Participate in security, ethical, or sustainability reviews.
- Support investigations relating to breaches of this Code.

Failure to meet these requirements may result in remediation plans, suspension, or termination of the supplier relationship.

Bluesource will endeavor to work with its Suppliers to ensure they are compliant and where necessary, review any identified corrective action plans. Failure to meet these requirements may result in remediation plans, suspension, or termination of the supplier relationship.

8 Whistle Blowing Policy

Concerns relating to ethical or business conduct matters, including accounting, internal accounting controls or auditing matters, should be brought to Bluesource's attention and may be made anonymously and confidentially.

Suppliers should report concerns about potential legal, regulatory or ethical misconduct, such as concerns regarding:

- regulatory compliance
- bribery or other improper payments
- potential money laundering or other suspicious activity
- inappropriate conflicts of interest
- the integrity of Bluesource's accounting practices, internal controls, auditing matters or public filings
- improper or questionable behavior by employees, supervisors, clients, counterparties, consultants, suppliers or other third parties.

9 Responsibilities

Bluesource Responsibilities

Bluesource is responsible for:

- Defining and maintaining this Supplier Code of Conduct and reviewing it at least annually.
- Making this Code available to Suppliers and communicating expectations clearly.
- Assessing supplier compliance where appropriate, including through proportionate due diligence, assurance activities, or reviews.
- Working with Suppliers in good faith to address identified issues and agree corrective actions where noncompliance is identified.
- Taking proportionate action where Suppliers fail to meet the requirements of this Code.

Supplier Responsibilities

Suppliers are responsible for:

- Complying with all requirements set out in this Supplier Code of Conduct.
- Ensuring that relevant personnel, subcontractors, and subprocessors understand and adhere to its requirements.
- Maintaining appropriate policies, processes, and controls to meet legal, contractual, security, ethical, and sustainability obligations.
- Promptly notifying Bluesource of any actual or suspected noncompliance with this Code.
- Cooperating with Bluesource on investigations, audits, assurance activities, and corrective actions where required.
- Ensuring that equivalent standards are applied throughout their own supply chains where relevant.

Individual Responsibilities (Supplier Personnel)

Individuals working for or on behalf of Suppliers who are involved in providing goods or services to Bluesource are expected to:

- Act in a lawful, ethical, and professional manner always.
- Protect Bluesource and Bluesource customer information in accordance with agreed security and privacy requirements.
- Report concerns, breaches, or suspected misconduct in line with applicable whistleblowing or reporting arrangements.

Escalation and Accountability


Failure to meet the responsibilities outlined in this Code may result in corrective action plans, increased monitoring, suspension, or termination of the supplier relationship, depending on the nature and severity of the issue.

10 Review

This policy is owned by the Head of Operations and is reviewed annually, or sooner if change requires it, to ensure continued alignment with:

- UN Global Compact principles
- Current legislation
- Best practices in sustainability and responsible business conduct.

11 Sign Off

For Bluesource	
Name	Nick Jagers
Position	Head of Operations
Signature	
Date	30 th March 2026

12 Revision History

Revision Date	Reviser	Description of Revision
12/03/2024	Nick Jagers	Adapted from Bluesource's Corporate and Social Responsibility Policy.
08/03/2025	Nick Jagers	No changes needed.
30/03/2026	Nick Jagers	Review and alignment with UN Global Pact principles, ISO27001 and the Company's Sustainability Policy.